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11 Attorneys for Plaintiffs/Counterdefendants

12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA

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15 ALLSTATE INSURANCE COMPANY,  
16 ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY, ALLSTATE  
17 INDEMNITY COMPANY, and ALLSTATE  
FIRE & CASUALTY INSURANCE  
COMPANY,

18 Plaintiffs,

19 v.

20 RUSSELL J. SHAH, MD, DIPTI R. SHAH,  
21 MD, RUSSELL J. SHAH, MD, LTD., DIPTI  
R. SHAH, MD, LTD., and RADAR  
22 MEDICAL GROUP, LLP dba UNIVERSITY  
URGENT CARE, DOES 1-100, and ROES  
23 101-200,

24 Defendants.

25 AND RELATED CLAIMS  
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CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE THE FILING  
DATE OF PLAINTIFFS' OPPOSITION  
TO DEFENDANTS' MOTION TO QUASH  
OR MODIFY SUBPOENAS AND FOR  
PROTECTIVE ORDER [ECF No. 227 and  
ECF No. 228]**

**(First Request)**

2:15-cv-01786-APG-CWH

STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE FILING DATE OF PLAINTIFFS' OPPOSITION  
TO DEFENDANTS' MOTION TO QUASH OR MODIFY SUBPOENAS AND FOR PROTECTIVE ORDER [ECF  
No. 227 and ECF No. 228]

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE  
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (collectively, the "Allstate  
4 Parties"), and Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D.,  
5 RUSSELL J. SHAH, MD, LTD., DIPTI R. SHAH, MD, LTD., and RADAR MEDICAL GROUP,  
6 LLP dba UNIVERSITY URGENT CARE (collectively, the "Radar Parties"), by and through their  
7 respective attorneys of record, stipulate and agree as follows:

8 **RECITALS**

9 WHEREAS, on January 29, 2018, the Radar Parties filed and served their Motion To Quash  
10 Or Modify Subpoenas And For Protective Order (Hearing Requested) [ECF No. 227 and ECF No.  
11 228]; and

12 WHEREAS, the Allstate Parties' Opposition to the Motion To Quash Or Modify Subpoenas  
13 And For Protective Order is presently due on February 12, 2018.

14 **STIPULATION**

15 1. The date for the Allstate Parties to file and serve their Opposition to the Radar Parties'  
16 Motion To Quash Or Modify Subpoenas And For Protective Order is continued from February 12,  
17 2018 to February 19, 2018.

18 Good cause exists for the above continuance as the spouse of one of the Las Vegas counsel for  
19 the Allstate Parties gave birth to a child on February 6, 2018, and counsel's office requires additional  
20 time to ensure resources are properly allocated to respond to the Motion.

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1 This is the first stipulation for an extension of time for the Allstate Parties to file their  
2 Opposition to the Radar Parties' Motion To Quash Or Modify Subpoenas And For Protective Order.

3 This stipulation is made in good faith and not to delay the proceedings.

4 IT IS SO STIPULATED.

5 Dated: February 7, 2018

Dated: February 7, 2018

6 McCORMICK, BARSTOW, SHEPPARD,  
7 WAYTE & CARRUTH LLP

BAILEY KENNEDY

8  
9 By: /s/ Dylan P. Todd

By: /s/ Joshua P. Gilmore

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*Attorneys for Defendants &  
Counterclaimant*

17 **ORDER**

18 IT IS SO ORDERED.

19 DATED this      February 8, 2018

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21   
22 UNITED STATES MAGISTRATE JUDGE  
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 7<sup>th</sup> day of February, 2018, a true and correct copy  
3 of **STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE FILING DATE OF**  
4 **PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO QUASH OR MODIFY**  
5 **SUBPOENAS AND FOR PROTECTIVE ORDER [ECF No. 227 and ECF No. 228]** was served  
6 via the United States District Court CM/ECF system on all parties or persons requiring notice.

7 Dennis L. Kennedy, Esq.  
8 Joseph A. Liebman, Esq.  
9 Joshua P. Gilmore, Esq.  
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13 *Attorneys for Defendants*

14 By /s/ Tricia A. Dorner

15 Tricia A. Dorner, an Employee of  
16 MCCORMICK, BARSTOW, SHEPPARD,  
17 WAYTE & CARRUTH LLP

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